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January 4, 2023

**BY ECF FILING**

Hon. Analisa Torres  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Proskauer Rose LLP v. Jonathan O'Brien*  
Case No. 22-cv-10918 (AT)

Dear Judge Torres:

I am litigation counsel to defendant Jonathan O'Brien in the above-captioned matter and write concerning the Temporary Restraining Order entered by the Court on December 28, 2022 to request a short extension and adjournment of two principal deadlines in this matter. We have been conferring in good faith with counsel for plaintiff Proskauer Rose LLP ("Proskauer") and they consent to this request. This is the first such request for an extension or adjournment.

Specifically, the parties have agreed that:

- Mr. O'Brien may have until 5:00 PM ET on January 6, 2023 by which to comply with Paragraph 2 of the Court's December 28, 2022 Order (Dkt. 15) (the "Order") to accommodate Mr. O'Brien's travel schedule. By way of context, Mr. O'Brien will be returning to New York from Mauritius during the afternoon of January 5. The current deadline for compliance with Paragraph 2 is January 5 at 12:00 PM ET, before Mr. O'Brien will have landed back in the country.
- The preliminary injunction hearing presently scheduled for January 10, 2023 will be adjourned for one week (or to a date at the Court's earliest convenience thereafter) to permit the parties to, among other things, negotiate a forensic protocol and explore whether the issues ultimately presented to the Court may be narrowed.



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Accordingly, Mr. O'Brien respectfully requests that the Court, as agreed by the parties:  
(1) set a **January 6, 2023 5:00 PM ET** deadline for compliance with Paragraph 2 of the Order  
and (2) adjourn the January 10, 2023 hearing until **January 17, 2023** or to a date at the Court's  
earliest convenience thereafter.

Respectfully submitted,

Beck Reed Riden LLP

A handwritten signature in blue ink, appearing to read 'Russell Beck', is written over a horizontal line.

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cc : All Counsel of Record (by ECF filing and Email)  
Russell Yankwitt, Esq. (by email)